

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
Case No. 1:18-96 MR- WCM

BRIAN HOGAN, et al.  
Plaintiffs,  
vs.  
CHEROKEE COUNTY, et al.  
Defendants.

**STIPULATIONS CONCERNING  
AUTHENTICITY AND  
ADMISSIBILITY OF  
DEFENDANTS' EXHIBITS**

Pursuant to this Court's Pretrial Order dated December 10, 2019 [Document 35], the following are a list of the stipulations concerning the authenticity and admissibility of the Defendants' exhibits. The "Y" in each box indicates that the Parties have stipulated about authenticity and or admissibility.

Exhibit	Brief Description	Stipulation Authenticity	Stipulation Admissibility	Objections	Identified By	Admitted
1.	August 24, 2012, Safety Assessment	Y				
2.	October 3, 2012, Safety Plan	Y				
3.	November 14, 2012, Risk Assessment Summary	Y				
4.	April 19, 2014, Safety Assessment	Y				
5.	October 30, 2015, Order for Nonsecure Custody	Y	Y			
6.	October 30, 2015, Affidavit as to Status of Minor Child	Y	Y			
7.	October 30, 2015, Juvenile Petition	Y	Y			
8.	Order on Need for Continued Nonsecure Custody	Y	Y			

9.	Attachment to Juvenile Petitions dated October 29, 2015	Y	Y			
10.	November 23, 2015, Adjudication Hearing Social Summary	Y	Y			
11.	Juvenile Order	Y				
12.	January 14, 2016, Adjudication Hearing Social Summary	Y	Y			
13.	January 14, 2016, Memorandum of Judgment/Order	Y	Y			
14.	April 1, 2016, Consent Order Adjudication Hearing	Y	Y			
15.	April 18, 2016, Investigation and Notes	Y				
16.	April 20, 2016, Safety Assessment	Y	Y			
17.	April - June 2016 Daily Activity Log	Y	Y			
18.	May 24, 2015, Notes from Mission Hospital	Y				
19.	May 3, 2016, Safety Assessment	Y	Y			
20.	May 12, 2016, Safety Assessment	Y	Y			
21.	May 12, 2016, Safety Resource Placement Memo of Agreement	Y	Y			
22.	May 12, 2016, Kinship Care docs	Y	Y			
23.	June 3, 2016, Family Risk Reassessment	Y	Y			
24.	July 1, 2016, Consent Form	Y				
25.	July 1, 2016, Safety Assessment	Y	Y			
26.	July 19, 2016, In Home Family Services Agreement	Y	Y			

27.	July 12, 2016, Safety Assessment	Y	Y			
28.	September 13, 2016, Family Risk Reassessment	Y	Y			
29.	October 21, 2016, Safety Assessment	Y	Y			
30.	June – October 2016 Daily Activity Log	Y	Y			
31.	October 10, 2016, Change of Placement Notification	Y	Y			
32.	Warren Hogan handwritten letter from 17 CVD 649	Y				
33.	January 26, 2018, Lauren Cariseo Email	Y	Y			
34.	January 25, 2018, NCDHHS CPS Intake Form	Y				
35.	January 31, 2018, CCDSS Letter to Lauren Gentry	Y				
36.	October 14, 2016, IEP Reevaluation	Y	Y			
37.	IEP October 28, 2015 to October 18, 2016	Y	Y			
38.	October 14, 2016, Decision of Local Education Agency	Y	Y			
39.	2016 and 2017 CC Schools Acknowledgements signed by Warren Hogan	Y	Y			
40.	May 9, 2017, Decision of Local Education Agency	Y	Y			
41.	IEP October 21, 2016 to October 13, 2017	Y	Y			
42.	October 9, 2017, CC Schools Acknowledgement signed by Warren Hogan	Y	Y			
43.	6 <sup>th</sup> Grade Progress Update with IEP Team	Y	Y			
44.	Cherokee County Schools Attendance Reports	Y	Y			

45.	CC Schools Parent Contact Documentation 2015-16	Y	Y			
46.	November 2, 2015, Notes	Y	Y			
47.	November 6, 2015, placement agreement	Y	Y			
48.	Melissa Jackson 11/5/15 Email re custody	Y				
49.	November 23, 2015, Safety Assessment	Y	Y			
50.	Allison Foster, Ph.D. Expert Report	Y	Y			
51.	Allison Foster, Ph.D. CV	Y	Y			
52.	Central Registry Victim Incident Display re Hogan/Edmondson/Sneed	Y				
53.	Julie Higdon November 1, 2017, Email re HH					
54.	Julie Higdon December 18, 2017, Email re HH reassignment					
55.	Julie Higdon February 13, 2018, email re HH					
56.	January 25, 2018, Intake Report					
57.	March 2, 2018, Intake Report					
58.	Julie Higdon May 18, 2018, Email re HH Mental Health					
59.	Andrews Middle School Documents re HH					
60.	October 15, 2019, NCDHHS Letter to DSS County Directors	Y				
61.	October 25, 2019, NCDHHS Letter to DSS County Directors	Y				
62.	CPS Intake Screening History					

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Respectfully submitted, this the 7<sup>th</sup> day of May, 2021.

s/Sean F. Perrin

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